



*Consulting Engineers
and Scientists*

PASTOR, BEHLING & WHEELER, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

September 8, 2008
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: August 2008 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.5 – Validation of groundwater analyses performed in July for samples from Zone B monitoring well NE4MW31B, Zone C monitoring well NE4MW32C and ten Zone A monitoring wells was completed. Analysis of an additional groundwater sample collected from monitoring well NE4MW32C and groundwater samples collected from piezometers NG3CPT1, NE4CPT2, NC2CPT3, and OCPT4 in July was performed.
 - Subtask 6.7 – Validation of wetland sediment sample analyses performed in July was completed.
 - Subtask 6.9 – A draft Nature and Extent Data Report (NEDR) is currently being prepared.

- Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
- Amendments to the waste profile forms for the off-site disposal of investigation-derived wastes that were included with the July 2008 monthly status report are provided in Attachment A.
 - Analytical laboratory reports for the groundwater sample analyses described above are provided in electronic form on the enclosed DVD.
 - Validation reports for the groundwater and sediment analyses described above are provided in electronic form on the enclosed DVD.
 - The updated database, including all data validated through August 31, 2008, is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through Cone Penetrometer Testing (CPT) piezometer installation, groundwater sample collection, sample analyses, data validation, and data evaluation.
 - Subtask 6.9 – Preliminary Site Characterization Report – to be continued through Draft NEDR preparation.
 - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 75% complete. No delays were encountered this month.

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Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, DEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a stylized flourish at the end.


Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLC

ATTACHMENT A
AMENDMENTS TO INVESTIGATION-DERIVED WASTE
PROFILE FORMS



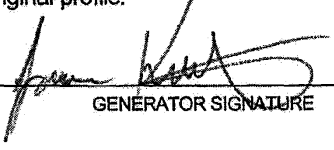
CHANGE REQUEST TO SPECIAL WASTE PROFILE

This form may be used to request changes to an existing Special Waste Profile.			
Generator Name:	LDL Coastal, LP		
Name of Waste:	Soil Cuttings	Approval Number:	L53Y88630
Description of Change Requested: Section III. Please remove "contaminant of concern is diesel".			
	Volume Increase:		
	Extend Expiration Date:		
REASON FOR CHANGE: (Provide detailed explanation of why the change is requested).			
The statement was inadvertently included in the initial profile.			
I hereby certify that the waste and the process generating the waste are unchanged and are accurately represented in the original profile.			
		8/19/08	
Jason Kettler		DATE	
USA Environment, LP		Project Manager	
GENERATOR (PRINTED NAME)		TITLE	
COMPANY			

11/15/00



CHANGE REQUEST TO SPECIAL WASTE PROFILE

This form may be used to request changes to an existing Special Waste Profile.			
Generator Name:	LDL Coastal, LP		
Name of Waste:	Drill Cuttings	Approval Number:	L53Y88631
Description of Change Requested: Section III. Please remove "contaminant of concern is diesel".			
	Volume Increase:		
	Extend Expiration Date:		
REASON FOR CHANGE: (Provide detailed explanation of why the change is requested).			
The statement was inadvertently included in the initial profile.			
I hereby certify that the waste and the process generating the waste are unchanged and are accurately represented in the original profile.			
		8/19/08	
Jason Kettler	GENERATOR SIGNATURE	DATE	
		Project Manager	
USA Environment, LP		TITLE	
GENERATOR (PRINTED NAME)			
COMPANY			

11/15/00